

Matthew R. Lewis (UT #7919)
(*ADMITTED PRO HAC VICE*)
Katherine E. Priest (UT #14758)
(*ADMITTED PRO HAC VICE*)
RAY QUINNEY & NEBEKER P.C.
36 South State Street, Suite 1400
P.O. Box 45385
Salt Lake City, Utah 84145-0385
Telephone: (801) 532-1500
Fax: (801) 532-7543
Email: mlewis@rqn.com
Email: kpriest@rqn.com

*Attorneys for Defendants Jessica Bjarnson,
Phillip Gannuscia, and Thomas Riskas*

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FRANK SLOBIG and JUDY SLOBIG,

Plaintiffs,

v.

PHILIP EDWARD GANNUSCIA, DAVID
GREGORY BEVAN, JESSICA BJARNSON,
THOMAS JAMES RISKAS, III, and
AUSTIN BAWDEN,

Defendants.

7:16-cv-03783-NSR

**NOTICE OF MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION AND IMPROPER
VENUE OR, ALTERNATIVELY, TO
TRANSFER VENUE**

Defendants Jessica Bjarnson, Phillip Gannuscia, and Thomas Riskas, by and through undersigned counsel, hereby move this Court to dismiss Plaintiffs' Complaint filed in the above entitled action for lack of personal jurisdiction and improper venue, or alternatively, to transfer venue to the Federal District Court for the District of Utah pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(3) and 28 U.S.C. §§ 1404 and 1406.

DATED this 31st day of May, 2017.

RAY QUINNEY & NEBEKER P.C.

/s/ *Katherine E. Priest*

Matthew R. Lewis

Katherine E. Priest

*Attorneys for Defendants Jessica Bjarnson, Phillip
Gannuscia, and Thomas Riskas*

CERTIFICATE OF SERVICE

I certify that on the 31st day May, 2016, the undersigned served a true and correct copy of the foregoing **NOTICE OF MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE OR, ALTERNATIVELY, TO TRANSFER VENUE** via U.S. Mail and Email to:

James P. Batson
Law Office of James P. Batson
8 Bedford Road
Katonah, NY 10536
Email: jamespbatsonlegal@gmail.com

Christopher Langone
langonelaw@gmail.com

/s/ Doris Van den Akker

1390742